

UNITED STATES DISTRICT COURT

for the

District of Oregon



United States of America

v.

Case No. 3:23-mj-00015

JOSE ISIDRO ZUNIGA TORRES,

*Defendant(s)***CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 24, 2023 in the county of Multnomah and elsewhere in the
District of Oregon, the defendant(s) violated:*Code Section*21 U.S.C. §§ 841(a)(1), (b)(1)(A)
(vi), and 846*Offense Description*Possession with Intent to Distribute Controlled Substances (Fentanyl) and
Conspiracy

This criminal complaint is based on these facts:

See affidavit of DEA, Special Agent Corey Shannahan which is attached and incorporated fully by reference

☒ Continued on the attached sheet.

/s/ Signed by Telephone

Complainant's signature

Special Agent, DEA

*Printed name and title*Sworn to by telephone or other reliable means at 5:10 ~~am~~ p.m. in accordance with Fed. R. Crim. P. 4.1Date: January 24, 2023*Judge's signature*City and state: Portland, Oregon

JOLIE A. RUSSO, U.S. Magistrate Judge

Printed name and title

DISTRICT OF OREGON, ss:

AFFIDAVIT OF COREY SHANNAHAN

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, [REDACTED] being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am an investigative or law enforcement officer of the United States, within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code. I have been employed as a Special Agent by the Drug Enforcement Administration (DEA) since January of 2022. My current assignment is at the Portland District Office where I am assigned to a DEA federal task force. My formal education includes a Bachelor of Arts in Finance. My formal law enforcement training includes successfully completing the 17-week DEA basic training course at the DEA academy in Quantico, Virginia, followed by 16 weeks of DEA field training in Portland, Oregon. During my field training, I participated in multiple drug investigations involving controlled purchase operations, interdiction, vehicle tracking, cell phone geo-location techniques, pen register/trap and trace orders, and Title III wiretaps. I have interviewed and operated informants, executed search warrants, arrested and interviewed subjects involved in the smuggling and distribution of narcotics, conducted physical surveillance, and utilized electronic and video surveillance. Prior to becoming a Special Agent, I investigated tax evasion and financial fraud for eight years while employed as a Revenue Agent for the Washington State Department of Revenue. I have also worked with and consulted numerous agents and law enforcement officers who have investigated drug trafficking offenses. As a Special Agent, I have participated in multiple drug investigations as either a case agent or as a supporting investigative agent, including in Title III wiretap

investigations. I am familiar with investigations of Drug Trafficking Organizations (hereinafter, “DTOs”), including identifying methods of importation and distribution of controlled substances, and how controlled substances are manufactured, consumed, packaged, marketed, smuggled, and distributed. I am also familiar with various tactics used by DTOs to import drugs into the United States, communicate with members of the DTOs, and arrange for transportation and distribution of drugs.

2. I submit this affidavit in support of a criminal complaint and arrest warrant for JOSE ISIDRO ZUNIGA TORRES (“**ZUNIGA**”) for violations of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(viii), 846, and 843: Possession with Intent to Distribute Controlled Substances.

3. This affidavit is intended only to show that there is sufficient probable cause for the requested arrest warrant and does not set forth all of my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Applicable Law

4. Title 21, United States Code, Section 841(a)(1), (b)(1)(A)(viii) and 846 make it illegal to possess with the intent to distribute a controlled substance, including fentanyl, or to conspire to do so. These offenses carry a maximum sentence of up to life imprisonment, a fine of up to \$10 million, and a five-year term of supervised release.

Statement of Probable Cause

Background of the Investigation

5. The Drug Enforcement Administration, Portland District Office Group D-51, in conjunction with Homeland Security Investigations (HSI), and Tigard Police Department (TPD), (hereinafter collectively “Investigators”) are investigating a Drug Trafficking Organization (DTO) suspected of importing heroin, methamphetamine, cocaine, and fentanyl from Mexico into the United States for further distribution in Oregon and Washington.

6. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

7. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ine

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8. [REDACTED]

[REDACTED]

9. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10. To date, Investigators have indicted and/or arrested 8 DTO members and seized approximately 5.1 kilograms of powdered fentanyl, approximately 4.5 kilograms of heroin, approximately 3.3 kilograms of cocaine, approximately 3.2 kilograms of crystal methamphetamine, approximately 45,000 counterfeit oxycodone pills containing fentanyl, and 12 firearms.

[REDACTED]

11. [REDACTED]

[REDACTED]

[REDACTED]

12. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

16. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

January 23, 2023: Surveillance of ZUNIGA at the Budget Inn Portland Motel and Acquisition of Search Warrant

17. On January 23, 2023 Investigators established surveillance in the vicinity of a Motel 6 in Portland, Oregon [REDACTED]

[REDACTED]

18. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19. Then at approximately 10:35 A.M., Investigators observed an older Hispanic man, later identified as **ZUNIGA**, and a younger Hispanic male exit a room of the Motel 6 while carrying multiple boxes. The two men then loaded the boxes into black Nissan Altima. Investigators continued to watch as the two men continued carried bags from the room to the Nissan Altima.

20. After the two men finished loading the boxes and bags from the motel room into the Nissan Altima, **ZUNIGA** entered the driver's seat of the Nissan Altima and the younger Hispanic male entered a Nissan Sentra parked beside the Nissan Altima.

21. Investigators followed the Nissan Altima and Nissan Sentra as they drove from the Motel 6 to the Budget Inn Portland motel parking lot. A short while later, the two men then unloaded all of the boxes and bags from their respective vehicles into a room located at the Budget Inn Portland motel.

22. On January 23, 2023, U.S. Magistrate Judge Jolie A. Russo in the District of Oregon, signed a search warrant [REDACTED] authorizing Investigators to search ZUINIGA's Room at the Budget Inn, the Nissan Altima, and the Nissan Sentra.

January 24, 2023: Investigators Execute Premises Search Warrant at Portland Budget Inn and Seize Narcotics and Firearms

23. On January 24, 2023, at approximately 9:00 A.M., Investigators established surveillance of the Portland Budget Inn and observed the black Nissan Altima parked in front of the entrance to the room where ZUNIGA was staying. At approximately 9:30 A.M., Investigators approached the room door while wearing protective equipment which clearly stated "Police" on the front and back. Investigators knocked on the door and verbally announced their presence as police officers. After no answer, Investigators made forced entry into the room. After making entry, ZUNIGA approached the front door and was detained without incident.

24. After conducting a security sweep of the room, Investigators began searching the room and Nissan Altima pursuant to the search warrants. During the search, Investigators found and seized the following items:

- Approximately 2,141.2 gross grams of a hard-rainbow-colored powdery substance packaged in numerous smaller bags weighing approximately one ounce each. Subsequent field tests for this substance indicated a presumptive positive for the presence of fentanyl. Approximately half of the powdered fentanyl was found in a green plastic bag beside the bed. The remaining half was found concealed inside of speakers which were packaged within large cardboard boxes recently wrapped in packaging tape.

- Approximately 417.2 gross grams of blue pills stamped M/30 packaged within multiple bags containing approximately 1,000 pills per bag. Subsequent field tests for the pills indicated a presumptive positive for the presence of fentanyl. The fentanyl pills were found within a green bag beside the bed.
- Approximately 393.0 gross grams of a clear crystalline substance packaged within multiple individual plastic bags. A subsequent field test for the substance returned a presumptive positive for the presence of crystal methamphetamine. The methamphetamine was found inside the same green plastic bag beside the bed.
- Approximately 49.2 gross grams of a white powdery substance individually packaged in small resealable plastic bags. A subsequent field test for the substance returned a presumptive positive for the presence of cocaine. The cocaine was found within a plastic big gulp cup located on a table located within the motel room.
- Eight firearms wrapped within tinfoil and clothing found within the same large cardboard boxes which appeared to have been recently wrapped in packaging tape.
- ZUNIGA's SP-8949 and another cellphone found on the bed inside of the motel room.



Pictured above: one of the boxes found in the Budget Inn Motel room, the “Big Gulp” container where individually wrapped packages of cocaine were found.



Pictured above: the green plastic bag containing powdered rainbow fentanyl, methamphetamine, and blue pills containing fentanyl.



Pictured above: an example of how the firearms discovered in the cardboard box were wrapped in tin foil and clothing.



Pictured above: all narcotics and firearms seized from the Budget Inn Motel.

25. Investigators also photographed but did not seize:

- A prescription pill container bearing the name “Jose I Zuniga Torres”

- Packaging material such as tinfoil, duct/packaging tape, and small resealable plastic bags
- A handheld weight scale.

[REDACTED]

26.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

27.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

28. Investigators then asked **ZUNIGA** about the various illegal drugs found in the motel room. **ZUNIGA** said the cocaine in the plastic big gulp container was his, as was the powdered fentanyl, fentanyl pills, and methamphetamine found in the green plastic bag besides the bed.

29. When asked about the powdered fentanyl found within the cardboard boxes, **ZUNIGA** said he had no idea that was in there and he only know about the drugs in the green bag and plastic big gulp container. Investigators asked **ZUNIGA** what he was intending to do

with all of the firearms found in the boxes, **ZUNIGA** responded that he intended to give the boxes to another individual at the motel later that day. **ZUNIGA** continued that firearms would then be shipped to Honduras and described wrapping the firearms in tinfoil and clothing so that they wouldn't be intercepted by law enforcement.

30. Investigators asked **ZUNIGA**, where he obtained the narcotics found in the motel room. **ZUNIGA** responded that he would go locations around Portland and meet with a friend who gave **ZUNIGA** the drugs. [REDACTED]

Conclusion

31. Based on the foregoing, I believe that **ZUNIGA** has committed violations of the Target Offenses and have conspired with others to do so.

32. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Paul Maloney, and AUSA Maloney advised me that in his opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant

Request for Sealing

33. It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested criminal complaint and arrest warrant. I believe that sealing these documents is necessary because the information to be seized

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is relevant to an ongoing investigation, and any disclosure of the information at this time is likely to seriously jeopardize the ongoing investigation. Premature disclosure of the affidavit, the criminal complaint, and the arrest warrant may adversely affect the integrity of the investigation.

/s/ Sworn to by telephone

In accordance with Fed. R. Crim. P. 4.1

[REDACTED]

DEA Special Agent

Sworn to by telephone at 5:15 ~~am~~/p.m. this 24 day of January, 2023 in
accordance with Fed. R. Crim. P. 4.1.



HONORABLE JOLIE A. RUSSO
United States Magistrate Judge